UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative of the Estate of Aldo Vera, Sr.,

Plaintiff,

VS.

THE REPUBLIC OF CUBA,

12 Civ. 1596 (AKH)

Defendant.

ALDO VERA, JR., as Personal Representative of the Estate of Aldo Vera, Sr., et al.,

: NOTICE OF CROSS-MOTION : FOR PROTECTIVE ORDER

Petitioners,

٧.

BANCO BILBAO VIZCAYA ARGENTARIA (S.A.), et al.:

Respondents/Garnishees.

PLEASE TAKE NOTICE that upon the Declaration of Kenneth A. Caruso, dated October 3, 2014, the exhibits attached thereto and the accompanying Memorandum of Law, Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA") will cross-move this Court, pursuant to Section 5240 of the New York C.P.L.R., made applicable by Federal Rule of Civil Procedure 69(a), on a date and at a time to be fixed by the Court, granting a protective order with respect to the turnover sought by Petitioners and granting such further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that papers in opposition to this cross-motion must be served by October 17, 2014, and reply papers in support of this cross-motion must be served by October 24, 2014.

Dated: New York, New York October 3, 2014 WHITE & CASE LLP

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To: All Counsel (by ECF)